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District Counsel for Tulare Local Healthcare District

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry St.
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC No.: WW-46

Date: November 15, 2018
Time: 9:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

DECLARATION OF SANFORD HASKINS IN SUPPORT OF MOTION FOR ORDER
AUTHORIZING ASSUMPTION OF UNEXPIRED NONRESIDENTIAL REAL
PROPERTY LEASES PURSUANT TO STIPULATION
(HEISKELL RANCHES, LP)

1 I, Sanford Haskins, hereby declare and represent as follows:

2
3 1. I am the Chief Administrative Officer ("CAO") of Tulare Local Healthcare
4 District, dba Tulare Regional Medical Center ("District" or "Debtor"), the Debtor in the
5 above-captioned Chapter 9 case.

6 2. I have personal knowledge of the facts contained herein and if I was called
7 as a witness, I would and could testify as is set out in this Declaration. I am over the
8 age of 18 and I am competent to testify as to the matters contained in this Declaration.

9
10 4. As CAO of the District I am personally familiar with the issues to be
11 resolved by this Motion.

12 5. I have personally reviewed the Motion for Order Authorizing Assumption of
13 Nonresidential Real Property Leases Pursuant to Stipulation ("Motion"), which seeks
14 authorization for the District to assume two nonresidential real property leases it has
15 with Heiskell Ranches, L.P. ("Heiskell"), as described with more particularity below.

16
17 6. I personally reviewed and signed the Stipulation for Assumption of
18 Nonresidential Real Property Leases ("Stipulation") which is filed concurrently herewith.

19 7. I assisted in the preparation of these documents and believe that the facts
20 stated therein are true and correct.

21 8. As stated in the Motion and Stipulation, the District is a party to the
22 following unexpired nonresidential real property leases with Heiskell (collectively
23 referred to as the "Leases"):

24
25 i. Lease for 880 E. Merritt, Suites 105-106, Tulare, California
26 ("Family X-Ray Center Lease"); and

27 ii. Lease for 880 E. Merritt, Suites 107-109, Tulare, California
28 ("Mineral Kings Toxicology Lease").

1 True and correct copies of the Leases are attached to the Stipulation as
2 Exhibits "A" and "B", respectively.

3 9. As CAO of the District, I have evaluated the Leases and considered the
4 District's financial position. The Leases pertain to certain commercial property from
5 which the District operates its x-ray center and toxicology laboratory. The District is the
6 lessee and Heiskell Ranches is the lessor under the Leases. Using my best judgment
7 on behalf of the District, I have determined that the Leases are essential to the District's
8 operations and intended plan of adjustment and that, under the circumstances, the
9 terms of the Leases are fair and reasonable and should be assumed.
10

11 10. The District is current on its obligations under the Leases.

12 I declare under penalty of perjury under the laws of the United States of America
13 that the foregoing is true and correct to the best of my information and belief.
14

15 Executed this 31st day of August, 2018, at Fresno, California.

16
17 
18 Sanford Haskins